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LSF9 Master Participation Trust and Mortgage Electronic
Registration Systems, Inc.*

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

KRISTINE KEYES,

Plaintiff,

v.

NATIONSTAR MORTGAGE, LLC, U.S.
BANK TRUST, N.A., AS TRUSTEE FOR
LSF9 MASTER PARTICIPATION TRUST,
MORTGAGE ELECTRONIC
REGISTRATION SYSTEMS, INC., BANK
OF AMERICA N. A. (AS CLAIMED
SUCCESSOR IN INTEREST TO
COUNTRYWIDE HOME LOANS, INC.),
SHERIFF OF CAMDEN COUNTY AND
RAS CITRON LAW OFFICES,

Defendants.

: HON. NOEL L. HILLMAN, U.S.D.J.

: Civil Action No. 1:20-cv-02649

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: **NOTICE OF MOTION FOR SANCTIONS
AND RELEATED RELIEF PURSUANT
TO FED. R. CIV. P. 11 AND N.J.S.A.
2A:15-59.1**

: (Document Filed Electronically)

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: **Return Date: July 20, 2020**

PLEASE TAKE NOTICE that on **July 20, 2020** at 10:00 a.m., or as soon thereafter as counsel may be heard, the undersigned, attorneys for defendants U.S. Bank Trust, N.A., as Trustee for LSF9 Master Participation Trust, and Mortgage Electronic Registration Systems, Inc. (“Defendants”), will move before the Honorable Noel L. Hillman, United States District Judge, at the U.S. District Court, District of New Jersey, Mitchell H. Cohen Building & U.S. Courthouse, 4th & Cooper Streets, Courtroom 3A, Camden, New Jersey 08101, for an Order imposing sanctions against plaintiff, Kristine Keyes, and Joshua L. Thomas, Esq., attorney for plaintiff; and

PLEASE TAKE FURTHER NOTICE that Defendants shall rely upon the Memorandum of Law and Certifications of Joy Harmon Sperling, Esq. submitted herewith; and

PLEASE TAKE FURTHER NOTICE that oral argument is requested if timely opposition to the motion is filed; and

PLEASE TAKE FURTHER NOTICE that at that time and place aforesaid, Defendants will request that the proposed form of Order submitted herewith be entered by the Court.

/s/ Joy Harmon Sperling

Joy Harmon Sperling, Esq.

Stephen R. Catanzaro, Esq.

DAY PITNEY LLP

*U.S. Bank Trust, N.A. as Trustee for
LSF9 Master Participation Trust and Mortgage
Electronic Registration Systems, Inc.*

Dated: June 23, 2020

CERTIFICATION OF SERVICE

The undersigned hereby certifies that on this date a copy of the Notice of Motion for Sanctions, with accompanying documents, was electronically filed using the CM/ECF system, which triggered electronic notification to the e-filers in this action, including counsel for Plaintiff.

I further certify that on this date a courtesy copy of the aforementioned motion papers was sent via regular mail to the Hon. Noel L. Hillman, U.S.D.J.

/s/ Stephen R. Catanzaro
STEPHEN R. CATANZARO

Date: June 23, 2020